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IPP

INTERMOUNTAIN POWER PROJECT
[illegible]
Telephone (801) 566-3303

July 25, 1978

Mr. Alan Merson
Regional Administrator
United States Environmental
Protection Agency
Region VIII
1860 Lincoln Street
Denver, Colorado 80295

Attention Mr. Dave Wagoner
Director, Air and Hazardous
Materials Division

Dear Mr. Merson:

Intermountain Power Project (IPP)
Notice of Intent to Construct

The Intermountain Power Project, by this letter, is submitting its Lynndyl Alternative Site to the Environmental Protection Agency (EPA) for review as required by Paragraph 52.12(d)(2), Prevension of Significant Deterioration of Air Quality (PSD), of EPA Regulations 40CFR52.21.

One volume of the report "Calculated Air Quality Impact of the Emissions from the Proposed IPP Power Plant at the Lynndyl Site" has been transmitted to you under separate cover by the H. E. Cramer Co., air quality consultant to IPP. This report provides the necessary supplemental air quality impact data as noted in the enclosed application.

One set of Volume I through V of the IPP Preliminary Engineering and Feasibility Study Report was previously transmitted to you in July 1977, as part of the application of the Project at the Salt Wash Site in Wayne County, Utah. Volume II, Generating Station, and sections of Volume V, not addressing air quality or air quality impacts, are generally applicable to the Project at the Lynndyl Site.

Requests for additional information relating to this application should be directed to:

Mr. James H. Anthony, Project Engineer
Intermountain Power Project
P. O. Box 111, Room 943
Los Angeles, California 90051
Phone: (213) 481-5352

Sincerely,

JOSEPH C. FACKRELL
Project Manager
Intermountain Power Project

JAA:nf
Enclosure

cc: Mr. Alvin E. Rickers (Utah) w/Encl.
H. E. Cramer Co., Inc. "
Attn. Mr. James F. Bowers, Jr.
Mr. Bill Wagner (BLM) "
Mr. Lynn Leishman (BLM) "

APPLICATION

NOTICE OF INTENT TO CONSTRUCT

INTERMOUNTAIN POWER PROJECT

LYNNDYL ALTERNATIVE

A. NAME AND ADDRESS OF APPLICANT

Intermountain Power Project (IPP)
8722 South 300 West
Sandy, Utah 84070

B. LOCATION OF PROJECT

The IPP Generating Station is proposed to be located approximately 11 miles north-northwest of Delta and 11 miles west of Lynndyl in Millard County, Utah, as shown on the attached Figures AL4 and AL5.

C. PROJECT DESCRIPTION

The IPP Generating Station will consist of four coal-fired, 750 megawatt steam-electric generating units. In addition to the turbine-generator and boiler units, the generating station will include coal handling and storage facilities, water treatment and storage facilities, cooling towers, stacks, waste processing facilities and an electrical switchyard.

To comply with all existing federal and state air quality and emission standards, IPP will employ the best available control technology (BACT) by using the following air pollution control equipment:

1. Electrostatic precipitators which will remove a minimum of 99.5 percent particulate matter (fly ash).
2. A flue gas desulfurization system (scrubbers) for SO2 removal for each unit. The scrubber for each unit will be a horizontal lime slurry spray type composed of five separate modules, each with five stages, that will remove a minimum of 90 percent of the SO2. In addition, the scrubber will remove approximately 50 percent of the fine particulate matter not removed by the electrostatic precipitators, resulting in an overall particulate removal efficiency of 99.75 percent.

A more detailed description of the generation station pollution control equipment is provided in the IPP Preliminary Engineering and Feasibility Study Report, Volume II.

D. EMISSIONS FROM THE PROPOSED PROJECT

Estimated emissions of the five criteria pollutants from the proposed Project are shown in Sections 3.1 and 3.2, Calculation Procedures and Results, Pages 26-40, "Calculated Air Quality Impact of the Emissions from the Proposed IPP Power Plant at the Lynndyl Site", by the H. E. Cramer Co., air quality consultant to IPP.

E. MITIGATING FACTORS

A discussion of mitigating factors for air quality is presented in Section 5.1.4.1, Pages 5.1-3 through 5.1-5 and Section 5.2.4, Page 5.2-1, Volume V, Environmental Assessment of the IPP Preliminary Engineering and Feasibility Study Report.

F. AIR QUALITY DATA

Local air quality data are presented in Section 1.3, Pages 5 through 9, "Calculated Air Quality Impact of the Emissions from the Proposed IPP Power Plant at the Lynndyl Site".

G. AIR QUALITY ANALYSIS

Air quality analysis is shown in Section 3, Pages 26 through 46, "Calculated Air Quality Impact of the Emissions from the Proposed IPP Power Plant at the Lynndyl Site".

Coal for the Lynndyl Site will most likely be obtained from a number of existing mines and/or leases located in the Northern Wasatch Plateau coalfield and the Book Cliffs coalfield. The table below shows typical average coal qualities which a number of the existing leaseholders are willing to guarantee from these respective properties:

Area	Btu*/#	Sulfur % By Weight	#S/MMBtu*	Ash % By Weight	#Ash/MMBtu*
1	12,200	0.5	0.41	8.8	7.2
2	11,950	0.54	0.45	10.5	8.7
3	12,150	0.63	0.61	6.2	5.1
4	11,000	0.60	0.56	13.0	11.8
5	12,200	0.60	0.49	6.0	4.9
6	12,770	0.79	0.61	8.4	6.6
Average	12,000	0.61	0.51	8.8	7.3

*(higher heating value, wet)

The coal quality expected over the life of the plant is represented by the average indicated in the table above. However, due to the fact that the Lynndyl Site is located near an existing commercial railroad, there are numerous other coal mines which could also provide coal to help meet the Project needs. There may be times during the operation of the Project (such as labor strikes, etc.) that significant quantities of "spot market" coal may be required. Since it is very difficult to project coal quality information for this kind of supply, the worse case emission rates for air quality assessment purposes have been established by modifying the average coal quality data shown above by decreasing the heating value by 15 percent, increasing the sulfur content by 30 percent, and increasing the ash content by 15 percent. This will provide reasonable flexibility in the coal quality that may be burned at the plant. Therefore, the maximum emission rates which are used for the 3-hour, 24-hour, and annual air quality assessments are based on the following coal characteristics:

Btu*/#	Sulfur % By Weight	#S/MMBtu*	Ash % By Weight	#Ash/MMBtu*
10,200	0.79	0.77	10.1	9.9

*(higher heating value, wet)

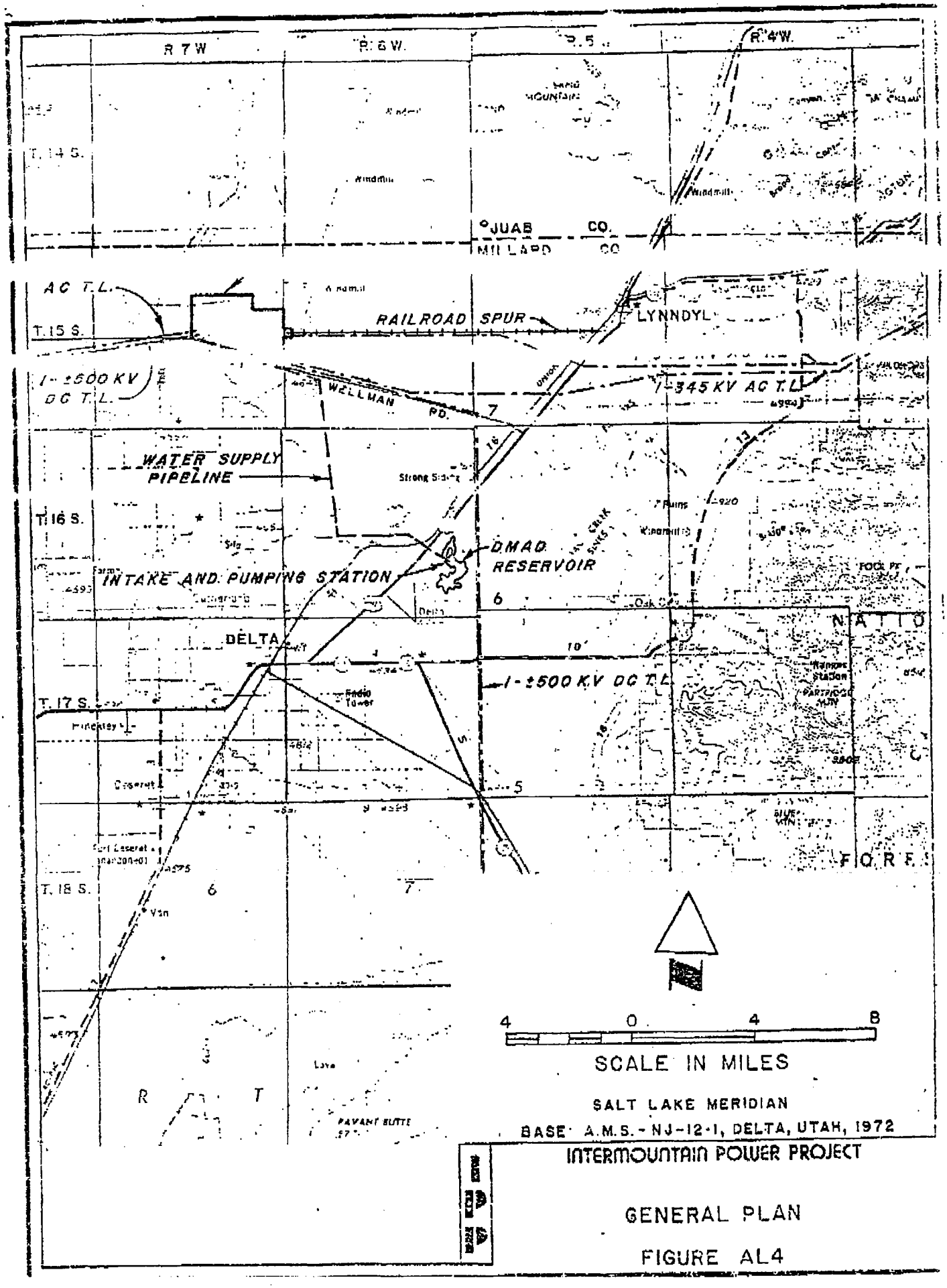
H. COMPLIANCE WITH OTHER REGULATIONS

A Notice of Intent to Construct has been filed with the State of Utah, Department of Social Services, Division of Health, Bureau of Air Quality, in accordance with Section 1.6, Air Conservation Regulations. There are no existing facilities on this site.

I. ENVIRONMENTAL STATEMENT

A site specific Environmental Statement (ES) addressing air quality impacts, as well as other impacts, is being prepared for this Project by the Bureau of Land Management (BLM), Richfield District Office, Richfield, Utah. A draft of this ES should be issued in March 1979.

JAA:nf
7-25-78



INTERMOUNTAIN POWER PROJECT

GENERAL PLAN

FIGURE AL4